

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
) Criminal No. 11-00101
 v.)
) (18 U.S.C. §§ 2252(a)(2),
 JOHN A. BROWNLEE, III) 2422(b), and 2251(a) and (e))

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U.S. DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

SUPERSEDING INDICTMENT

COUNT ONE

The grand jury charges.

On or about February 4, 2011, in the Western District of Pennsylvania, the defendant, JOHN A. BROWNLEE, III, did knowingly distribute visual depictions, using a means and facility of interstate and foreign commerce, specifically, by computer, the production of said visual depictions having involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TWO

The grand jury further charges.

Beginning on or about November 1, 2010, and continuing thereafter until on or about May 12, 2011, in the Western District of Pennsylvania, the defendant, JOHN A. BROWNLEE, III, did use facilities and means of interstate and foreign commerce, specifically a computer, the internet, and the telephone, to knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense

In violation of Title 18, United States Code, Section 2422(b) .

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COUNT THREE

The grand jury further charges.

On or about April 30, 2011, and continuing thereafter until on or about May 12, 2011, in the Western District of Pennsylvania, the defendant, JOHN A BROWNLEE, III, did attempt to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, and such visual depiction was intended to be produced using materials that had been mailed, shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One, Two, and Three of this Superseding Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeitures pursuant to Title 18, United States Code, Section 2253(a)(3).

2. As a result of the commission of the violations charged in Counts One, Two, and Three of this Superseding Indictment, the defendant, JOHN A. BROWNLIE, III, did use the following to commit or to promote the commission of said violations (hereinafter collectively referred to as the "Subject Property")


- a. a Nikon CoolPix Digital Camera S-4100; Serial No. 33085509;
- b. a grey, 2005 Honda Civic, VIN 2HGES16395H627744, Pennsylvania license plate GDR8264; and
- c. a Samsung Cricket cellular telephone, silver and black, model SCH-R210, FCC ID No. A3LSCHR210A.

WHEREFORE, the government seeks Forfeiture of the Subject Property pursuant to Title 18, United States Code, Section 2253(a)(3).

A True Bill



FOREPERSON



DAVID J. HICKTON
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